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16  
17 **IN THE UNITED STATES DISTRICT COURT**  
18  
19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
20  
21 **SAN FRANCISCO DIVISION**

22 IN RE CAPACITORS ANTITRUST  
23 LITIGATION

Master File No. 3:14-cv-03264-JD

MDL No. 17-md-02801

24 THIS DOCUMENT RELATES TO:

25 FLEXTRONICS INTERNATIONAL USA,  
26 INC.'S ACTION

27 **STIPULATION AND [PROPOSED] ORDER**  
28 **OF DISMISSAL WITH PREJUDICE BY**  
**FLEXTRONICS INTERNATIONAL USA,**  
**INC. AND TAITSU CORPORATION AND**  
**TAITSU AMERICA, INC.**

1 Plaintiff Flextronics International USA, Inc. (“Flextronics”) and Defendants Taitso  
2 Corporation and Taitso America, Inc. (collectively, “Taitso”), by and through undersigned  
3 counsel, stipulate and agree that Flextronics hereby dismisses with prejudice all claims being  
4 asserted against Taitso in the above-captioned actions pursuant to the Federal Rules of Civil  
5 Procedure 41(a)(1)(A)(ii) and 41(a)(2). In support of this stipulation of dismissal, the parties state  
6 as follows:

- 7
- 8 1. Flextronics and Taitso seek the dismissal of this action with prejudice.
  - 9 2. This stipulation does not affect the rights or claims Flextronics may have against  
10 any other Defendant or alleged Co-Conspirator in this litigation.
  - 11 3. Each party shall bear their own costs, expenses, and attorneys’ fees.

12 WHEREFORE, the parties respectfully request that the Court issue the [Proposed] Order  
13 of Dismissal.

14 **IT IS SO STIPULATED.**

15 Dated: November 6, 2019

Respectfully submitted,

16 **WILLIAMS MONTGOMERY & JOHN LTD.**

17 By: /s/ Charles E. Tompkins

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*Counsel for Defendants Taitso Corporation and Taitso  
America, Inc.*

1                                   **IN THE UNITED STATES DISTRICT COURT**  
2                                   **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
3                                   **SAN FRANCISCO DIVISION**

4                   IN RE CAPACITORS ANTITRUST  
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7                   THIS DOCUMENT RELATES TO:  
8                   FLEXTRONICS INTERNATIONAL USA,  
9                   INC.'S ACTION

**[PROPOSED] ORDER**

10                                   **[PROPOSED] ORDER**

11                   Pursuant to the stipulation and upon good cause, the Court ORDERS the following:

12                   Pursuant to Rules 41(a)(1)(A)(ii) and 41(a)(2) of the Federal Rules of Civil Procedure, all  
13                   claims asserted in the above-captioned action by Plaintiff Flextronics International USA, Inc.  
14                   against Defendants Taitso Corporation and Taitso America, Inc. are DISMISSED WITH  
15                   PREJUDICE. Each party shall each bear its own costs and attorneys' fees.

16                   **IT IS SO ORDERED.**

17  
18                   Dated: \_\_\_\_\_

19  
20  
21                   \_\_\_\_\_  
22                   **HONORABLE JAMES DONATO**  
23                   **UNITED STATES DISTRICT JUDGE**  
24  
25  
26  
27  
28

**ATTESTATION**

In accordance with Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings before the United States District Court for the Northern District of California, I, Charles E. Tompkins, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: November 6, 2019

/s/ Charles E. Tompkins

Charles E. Tompkins

*Counsel for Flextronics International USA, Inc.*

**CERTIFICATE OF SERVICE**

In accordance with Rule 5-5 of the Local Rules of Practice in Civil Proceedings Before the United States District Court for the Northern District of California, I, Charles E. Tompkins, hereby certify under penalty of perjury under the laws of the United States of America that on November 6, 2019, a true copy of the above document was filed through the Court's Case Management/Electronic Case Filing ("CM/ECF") System and served by that System upon all counsel of record registered for the System and deemed to have consented to electronic service in the above-captioned case.

/s/ Charles E. Tompkins

Charles E. Tompkins

*Counsel for Flextronics International USA, Inc.*